

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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In re:	:	Chapter 11
	:	
DEEP MARINE HOLDINGS, INC., <u>et al.</u>	:	Case No. 09-39313
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	
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**GREENBERG TRAURIG, LLP'S
WITNESS AND EXHIBIT LIST**

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Greenberg Traurig, LLP ("GT"), and hereby submits its *Witness and Exhibit List* in connection with the October 12, 2010 hearing on *Application of Greenberg Traurig, LLP for Allowance of Substantial Contribution Claim Pursuant to 11 U.S.C. §§ 503(B)(1)(A) and 503(B)(3)(D) and Fed. R. Bankr. P. 2016.*

WITNESSES

1. John Stanley "Chip" Rainey, Shareholder of Greenberg Traurig, LLP;
2. K. B. Battaglini, Shareholder of Greenberg Traurig, LLP;
3. Alan I. Annex, Shareholder, Greenberg Traurig, LLP;
4. Kenneth A. Gerasimovich, Shareholder, Greenberg Traurig, LLP;
5. Jason G. Cohen, Bracewell & Giuliani, LLP;
6. Marcy E. Kurtz, Bracewell & Giuliani, LLP;
7. Rebuttal witnesses; and
8. Any witness designated by any other party.

EXHIBITS

No.	Description	Offered	Objection	Date Admitted	Date Not Admitted
1.	Debtors' Expedited Application to Approve Retention of Greenberg Traurig LLP as Special Counsel to the Debtors [Docket No. 137]				
2.	Letter from John D. Bittner, Deep Marine Technology, Inc. to K.B. Battaglini of Greenberg Traurig, dated February 25, 2010				
3.	Letter from K. B. Battaglini of Greenberg Traurig to John D. Bittner of Deep Marine Holdings Inc and Deep Marine Technology Inc., dated March 3, 2010				
4.	Letter from John D. Bittner, Deep Marine Technology, Inc. to K.B. Battaglini of Greenberg Traurig, dated June 21, 2010				
5.	Letter from K. B. Battaglini of Greenberg Traurig to John D. Bittner of Deep Marine Holdings Inc and Deep Marine Technology Inc., dated June 29, 2010				
6.	Application of Greenberg Traurig, LLP for Allowance of Substantial Contribution Claim Pursuant to 11 U.S.C. §§ 503(B)(1)(A) and 503(B)(3)(D) and Fed. R. Bankr. P. 2016 [Docket No. 586]				

GT reserves the right to use any exhibits presented by any other party. GT also reserves the right to use exhibits not listed here for impeachment or rebuttal purposes at the October 12, 2010 Hearing.

GT reserves the right to amend or supplement this Witness and Exhibit List.

Respectfully submitted this 8th day of October, 2010.

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By: /s/ K. B. Battaglini

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 8, 2010, a true and correct copy of the foregoing was electronically filed with the Clerk of the United States Bankruptcy Court for the Southern District of Texas, and was served on all parties on the attached master service list by electronic means as listed on the Court's ECF facilities, by electronic mail as indicated, and/or by United States first class mail, postage prepaid.

/s/ K. B. Battaglini

K. B. Battaglini

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